

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**U.S. SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**VLADISLAV KLIUSHIN (a/k/a  
VLADISLAV KLYUSHIN), et al.,**

**Defendants.**

**Case No. 1:21-cv-12088-WGY**

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT AS TO DEFENDANTS  
RUMIANTCEV, IRZAK, SLADKOV, AND YERMAKOV**

Pursuant to Federal Rule of Civil Procedure 55(b)(2) and for the reasons set forth in the accompanying Memorandum of Law and supporting materials and for good cause shown, Plaintiff U.S. Securities and Exchange Commission (“SEC”) respectfully moves the Court to enter default judgment against Defendants Nikolai Rumiantcev, a/k/a Nikolay Rumyantcev (“Rumiantcev”), Mikhail Irzak (“Irzak”), Igor Sladkov (“Sladkov”), and Ivan Yermakov, a/k/a Ivan Ermakov (“Yermakov”) (collectively, “Defaulting Defendants”),<sup>1</sup> which default judgment, as set forth in the accompanying proposed order: (1) permanently restrains and enjoins Defaulting Defendants from future securities law violations, directly or indirectly; (2) orders Defaulting Defendants to pay disgorgement of their ill-gotten gains with prejudgment interest; and (3) orders Defaulting Defendants each to pay civil monetary penalties pursuant to Section 21A of the Securities Exchange Act of 1934 [15 U.S.C. § 78u-1] in the amount of three times

---

<sup>1</sup> The undersigned was unable to confer with Defaulting Defendants because they have failed to appear or defend in this action, they are not represented by counsel, and no individual has been authorized to represent them in this matter.

their ill-gotten gains.

Accordingly, the Court should grant the SEC's Motion and enter default judgment as set forth in the accompanying proposed order.

Dated: December 14, 2023

Respectfully submitted,

/s/ Jennifer L. Farer

James P. Connor

Jennifer L. Farer

U.S. SECURITIES AND EXCHANGE COMMISSION

100 F Street, N.E., Washington, DC 20549

Tel: 202-285-1516 (Connor)

Tel: (202) 551-5072 (Farer)

connorja@sec.gov

farerj@sec.gov

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Jennifer L. Farer, certify that on December 14, the foregoing was filed using the Court's CM/ECF system, which constitutes service upon all registered ECF users, including counsel for Defendant Vladislav Kliushin. In addition, copies of the foregoing were sent to the other Defendants at the following email addresses:

<b>Defendant</b>	<b>Email Address</b>
Nikolai Rumiantcev	nr@m13.su
Mikhail Irzak	mikka777@yahoo.com
Igor Sladkov	isladkov@mail.ru
Ivan Yermakov	i.s.ermakov@yandex.ru

/s/ Jennifer Farer  
Jennifer L. Farer